

EPA Response/request	CTV Change / Response
Injection Well Construction	
QASP show a maximum calibrated working pressure of 3,000 psi, which is lower than the maximum surface injection pressure of 3,800 psi	QASP Tables 10-12 were updated.
Please clarify why the risk factors (temperature, pressure and corrosivity) are considered to be low and include further justification as to why the downhole shutoff system is not necessary.	Page 7 of each respective COP document, under "Alarms and shut off devices".
Please confirm the base of the lowermost USDW. Please note the definition of USDW (40 CFR 146.3) below.	The surface casing is at 501' and the USDW is at 806'. There is an intermediate string of casing between the surface string and long-string that is cemented to surface and will protect the USDW. Historical drilling in the Elk Hills oil field used these drilling practices to mitigate fluid losses and hole stability issues due to the unsaturated Tulare sand interval.
Please provide data or sources as evidence that lead to the determination that no subsidence has occurred in the area.	Further support added to page 4 and 5 of each respective document.
EPA requests that, for clarity, the conductor casing grade (which was reported as H-40 in the initial application) be included on Table 1. If this information was incorrect, please explain how the conductor casing is suitable for CO2 injection.	H-40 or better grade conductor casing was utilized in construction, which is suitable for CO2 injection because the material will not come into contact
Because the tubing grade was changed from 13CR-95 to L-80 CRA, please ensure that the coupons used in the corrosion monitoring section of the Testing and Monitoring Plan are revised accordingly.	The Testing and Monitoring Plan has been updated to account for the change.
Please update the QASP to show equipment with pressure ratings of 5,000 psi.	QASP Tables 10-12.
Please update Attachment G2 to include the pre-operation testing plan for the deep monitoring wells.	CTV will include in preoperational testing plan
Please provide a pre-operational testing plan to test the compatibility of the injectate with well construction materials.	CTV will include in preoperational testing plan
Injection Well Pre-operational Testing	
Please provide an updated pre-operational testing plan that describes the tests identified in CTV's responses to questions in this document. For example, the plan should include: an SAPT of an appropriate test duration and MITs on monitoring wells 342-7R-RD1 and 327-7R-RD1.	CTV will include in preoperational testing plan
Monitoring Well Pre-operational Testing	
Please include an external MIT in the pre-operational testing plan for wells that are proposed to be converted to monitoring wells.	CTV will include in preoperational testing plan